

## REMARKS

The Applicants have carefully reviewed the Office action and the references cited therein. In the Office action, claims 1 and 22 were rejected under 35 U.S.C. § 102(e) as anticipated by Strauss et al. (US 6,272,126); claim 13 was rejected under 35 U.S.C. § 102(e) as anticipated by Clarke, Jr. et al. (US 6,021,419); claims 2-6 were rejected under 35 U.S.C. § 103(a) as unpatentable over Strauss et al. in view of one or more of Ng et al. (US 6,243,376), Lin et al. (US 6,791,952), and Gerszberg et al. (US 6,542,500); and claims 14-20 were rejected under 35 U.S.C. § 103(a) as unpatentable over Clarke, Jr. et al. in view of one or more of Lin et al., Gerszberg et al., and Ng et al. In addition, claim 21 was indicated as allowable. Accordingly, claim 21 is not discussed further herein. By way of the following remarks, the Applicants respectfully traverse the rejections and submit that all pending claims are in condition for allowance. Notification to that effect is earnestly requested.

### **I. Independent Claim 1**

The Applicants respectfully submit that independent claim 1 is allowable over the art of record. Independent claim 1 is directed to a method of operating a home gateway system and recites, *inter alia*, detecting a dialing of a destination telephone number and establishing a telephony connection with an internet service provider ... in response to the dialing of the destination telephone number. Strauss et al. do not describe or suggest these elements. Instead, Strauss et al. describe a voice server (418) that receives digits dialed at a calling terminal (442). *Strauss et al.*, 12:11-16. However, Strauss et al. make it clear that the dialed digits are not a destination telephone number, as recited in claim 1. In particular, Strauss et al. describe that a dialer dials a local number that is mapped to a destination telephone number stored in a table (210). *Strauss et al.*, 9:13-28 and FIG. 4. The table (210) is stored in a database (422) that is communicatively coupled to the voice server (418). *Id.*, 12:17-19. To retrieve a destination telephone number of a called party from the table (210), the voice

server (418) receives the local number dialed at the calling terminal (442) and forwarded by a central office (426) coupled to the calling terminal (442). *Id.*, 12:19-24. Therefore, neither the central office (426) nor the voice server (418) detect the dialing of a destination telephone number as recited in claim 1. Instead, Strauss et al. describe that the central office (426) detects the dialing of a local number, and the central office (426) forwards the local number to the voice server (418), which retrieves a corresponding destination telephone number from the database (422).

Further, claim 1 recites establishing a telephony connection with an internet service provider ... in response to the dialing of the destination telephone number. Because, Strauss et al. do not describe that the destination telephone number is dialed, but instead retrieved from the database (422) based on the dialing of a local number, Strauss et al. does not describe or suggest establishing a telephony connection with an internet service provider ... in response to the dialing of the destination telephone number as recited in claim 1. Therefore, Strauss et al. do not describe or suggest each and every element recited in claim 1 and, thus, cannot anticipate claim 1. Accordingly, the Applicants respectfully submit that independent claim 1 and all claims dependent thereon are in condition for allowance.

## **II. Independent Claim 13**

The Applicants respectfully submit that independent claim 13 is allowable over the art of record. Independent claim 13 is directed to a home gateway system and recites, *inter alia*, a router to send a request to a processor to establish a communication session with an internet service provider (ISP) and the processor to direct the transceiver to establish a telephony connection with the internet service provider. Clarke, Jr. et al. do not describe a home gateway system, but instead describe a satellite communication system, which is different from a home gateway system to which claim 13 is directed. Further, Clarke, Jr. et al. describe that ISP(s) (110) are connected to a router (118) in a satellite uplink facility (115)

via T1 lines (111). *Clarke, Jr. et al.*, 1:25-37. However, Clarke, Jr. et al. do not describe or suggest a router requesting a processor to establish a telephony connection with an ISP as recited in claim 13. Instead, Clarke, Jr. et al. describe a communication configuration starting at the ISP (110), and it is the ISP (110) which establishes communications with the satellite uplink facility (115). Therefore, because Clarke, Jr. et al. do not describe or suggest a router requesting a processor to establish a telephony connection with an ISP, Clarke, Jr. et al. do not describe each and every element of independent claim 13 and, thus, cannot anticipate claim 13. Accordingly, the Applicants respectfully submit that independent claim 13 and all claims dependent thereon are in condition for allowance.

### **III. Conclusion**

For at least the foregoing reasons, the Applicants respectfully submit that all of the claims pending in the instant application are in condition for allowance. Reconsideration is respectfully requested. If there are any remaining issues in this application, the Examiner is invited to contact the undersigned representative at the telephone number below.

The Commissioner is authorized to charge any deficiency in the payment submitted herewith toward payment of any fee due for the filing of this paper to deposit account number 50-2455.

Respectfully submitted,

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Dated: **September 11, 2008**

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